

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: § **BANKRUPTCY CASE NO.**
§
JET PRESSURE WASHERS, LTD., § **11-32090-H3-11**
§
DEBTOR § **Chapter 11**

EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL

COMES NOW JET PRESSURE WASHERS, LTD., Debtor, and files this its Emergency Motion for Authority to Use Cash Collateral, and in support thereof would respectfully state as follows:

1. Movant is the Debtor and Debtor in Possession herein.
2. Commercial Credit Group asserts a security interest in all of Debtor's accounts receivable and inventory to secure indebtedness owed it by Debtor.
3. Debtor needs to continue its business herein in order to be able to propose a plan of reorganization.
4. Debtor has no alternative borrowing source and to remain in business must be permitted to use its funds collected from normal business operations to pay its employees, insurance, utilities, and to pay for necessary repairs, maintenance and office expenses.
5. This motion is an emergency motion under Bankruptcy Rule 4001(b)(2). Pending a final hearing on the relief requested by this motion, the Debtor needs to use the cash collateral to avoid immediate and irreparable harm to the estate in that absent such use the Debtor would be required to cease operations.
6. The cash collateral at issue herein is in effect the funds collected from normal business operations generated monthly, with an average collateral value of approximately

\$30,000.00 per month. Debtor is requesting authorization for use of cash collateral for 14 days in the amount of \$15,000.00. Obviously, Debtor consents to giving Commercial Credit Group a replacement lien on all of its security.

WHEREFORE, premises considered, Debtor respectfully moves this Honorable Court to authorize its use of cash collateral on an emergency basis and at a final hearing, and for such other and further relief as is just.

Respectfully submitted,

/s/ Margaret M. McClure
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ATTORNEY FOR DEBTOR

JET PRESSURE WASHERS, LTD
14 and 30 DAY BUDGET
CASH BASIS

	Day 1-14	Day 15-30	Total
Rental Income	\$ 15,000	15,000	30,000
Cost of Goods Sold			
Parts & Supplies	1,250	3,500	4,750
Total Cost of Goods Sold	<u>\$ 1,250</u>	<u>3,500</u>	<u>4,750</u>
Gross Profit	\$ 13,750	11,500	25,250
Operating Expenses			
Auto Expenses - Registration	-	78	78
Office Expenses	-	250	250
Payroll Taxes	658	658	1,317
Rent - Building	3,500	-	3,500
Repairs	250	250	500
Sales Tax	-	1,200	1,200
Telephone	308	-	308
Utilities	260	-	260
Wages	8,606	8,606	17,212
Total Operating Expenses	<u>\$ 13,582</u>	<u>11,042</u>	<u>24,625</u>
Net Income	<u><u>\$ 168</u></u>	<u><u>458</u></u>	<u><u>625</u></u>

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically mailed or mailed by first class mail, postage prepaid, this 4th day of March, 2011 to the following:

Mr. Judy A. Robbins
U.S. Trustee
515 Rusk, 3rd Floor
Houston, Texas 77002

Mr. Jerald Templeton
Jet Pressure Washers, Ltd.
P.O. Box 1002
La Porte, Texas 77572-1002

Mr. John Mayer
Ross, Banks, May, Cron & Cavin, P.C.
2 Riverway, Suite 700
Houston, Texas 77056-1918

Via Facsimiles: 713-623-6014

ATTORNEY FOR COMMERCIAL CREDIT GROUP

Ms. Laura Huskey
Texas Citizens Bank
P.O. Box 7350
Pasadena, Texas 77508-7350

Via Facsimile: 713-948-9331

/s/ Margaret M. McClure
MARGARET M. MCCLURE